

September 6, 2011



Chairman Julius Genachowski
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: WC Docket No. 10-90
WC Docket No. 03-109

Dear Chairman Genachowski:

The National Congress of Black Women has long supported government efforts to bridge the digital divide through Universal Service Fund programs like the E-Rate. We are encouraged by your efforts to more broadly apply USF to solving this problem by expanding programs like Lifeline, LinkUp and the High Cost Fund to apply to broadband services.

Broadband adoption in Black households, while below the national average, has improved: 59% of households subscribe, according to the National Broadband Plan. Yet we know that individuals who earn less and who are less educated are far less likely to sign up, forgoing a technology that can eliminate so many barriers to social and economic achievement, not to mention higher educational attainment. Urging adoption should be the primary focus of USF reform.

We can achieve this national goal by making USF more efficient and more focused on assisting individuals and families who struggle to afford Internet access or computers and by installing broadband networks in the few areas where they do not exist today. NCBW recommends shifting a portion of the existing Low Income Fund to provide direct financial support to qualifying households for the installation of and monthly subscription to broadband service. As part of this effort, the Commission should consider creating a targeted program whereby community organizations can receive funding to promote adoption of broadband by educating eligible households about the availability of Lifeline and LinkUp for Internet service and providing digital literacy and other relevant training. A template for this type of program already exists in the form of adoption projects funded by the National Telecommunications & Information Administration under the American Recovery and Reinvestment Act.

The Commission can also free consumers of some of the burdensome fees associated with traditional phone services, creating more disposable income to apply to broadband. Studies show that the High Cost Fund provides close to \$2 billion in subsidies in areas already receiving service. By abolishing duplicate subsidies and focusing on the 9 million U.S. households that cannot subscribe to broadband even if they want it, the FCC will make a deep cut in the 15% fee that Americans have been paying on their phone bills to feed the growing USF, which has doubled since 2000.

Similarly, the Commission can bring price relief to millions of consumers by applying any changes to intercarrier compensation rates to all voice carriers right away. The pace of technology dictates that the price we pay for these services should fall over time, not rise. If the FCC takes the necessary step of

lowering these rates to hundredths of a penny per minute, the savings should extend to every consumer right away.

By making these changes a part of the USF modernization effort, I believe that the Commission can both stimulate broadband adoption and save consumers billions at a time when every dollar counts. NCBW applauds your efforts and we look forward to being of further assistance.

Sincerely,

/s/

Dr. E. Faye Williams, Esq
National Chair